

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA)	
)	No. 03 CR 551
v.)	
)	Violations: Title 18, United States Code,
GERALDINE COOPER,)	Sections 1028(a)(1), 1028(a)(5), 1028(a)(7),
aka "Marge Henderson";)	1028(f), 1344, and 2
LAMONT MARTIN;)	
TIANA HILL;)	
BONNIE WILLIAMS;)	
ANTHONY VAUGHN,)	
aka "Bilal Salahuddin";)	
KIMBERLY RUCKER,)	
aka "Lisa Perry,")	
aka "Sharon Newell";)	
RICQUIA ABRAMS;)	
PAMELA FOX,)	
aka "Laverne Fox";)	
JAMES SMITH,)	
aka "Smitty";)	
JOHN LEWIS,)	
aka "Buttons"; and)	
CHONTELLA COOKS)	

COUNT ONE

The SPECIAL MARCH 2004 GRAND JURY charges:

1. At times material to this indictment:
 - a. University National Bank was a financial institution, the deposits of which were insured by the Federal Deposit Insurance Corporation.
 - b. Old Kent Bank, now doing business as Fifth Third Bank, was a financial institution, the deposits of which were insured by the Federal Deposit Insurance Corporation.
 - c. Fifth Third Bank was a financial institution, the deposits of which were insured by the Federal Deposit Insurance Corporation.

d. Citizens Financial Bank was a financial institution, the deposits of which were insured by the Federal Deposit Insurance Corporation.

e. Bank One was a financial institution, the deposits of which were insured by the Federal Deposit Insurance Corporation.

f. Harris Bank was a financial institution, the deposits of which were insured by the Federal Deposit Insurance Corporation.

g. LaSalle Bank was a financial institution, the deposits of which were insured by the Federal Deposit Insurance Corporation.

h. Charter One Bank was a financial institution, the deposits of which were insured by the Federal Deposit Insurance Corporation.

i. Hyde Park Bank was a financial institution, the deposits of which were insured by the Federal Deposit Insurance Corporation.

j. The University of Chicago Physicians' Group (the "UCPG") was part of the University of Chicago encompassing the practicing physicians at the University of Chicago Hospitals. Among other things, UCPG was responsible for billing patients on behalf of practicing physicians at the University of Chicago Hospitals.

k. Defendant TIANA HILL was employed by the UCPG and worked as an administrative employee in the remittance department.

l. Lincoln Park Family Physicians, 1317 West Diversy Parkway, Chicago, Illinois, was a group of doctors providing medical care to persons in the greater Chicago area.

m. Defendant BONNIE WILLIAMS was employed by Lincoln Park Family Physicians and worked as a receptionist.

2. Beginning in or about August 2000 and continuing until in or about October 2003, in the Northern District of Illinois, Eastern Division and elsewhere,

GERALDINE COOPER,
LAMONT MARTIN,
TIANA HILL,
BONNIE WILLIAMS,
ANOTHONY VAUGHN,
KIMBERLY RUCKER,
RICQUIA ABRAMS,
PAMELA FOX,
JAMES SMITH,
JOHN LEWIS, and
CHONTELLA COOKS,

defendants herein, did conspire with each other, and with others, known and unknown to the Grand Jury, to:

(a) knowingly transfer and use in and affecting interstate commerce, without lawful authority, means of identification of other persons, namely, names, dates of birth, social security numbers, addresses, and phone numbers, with the intent to commit, and to aid and abet, unlawful activity that constitutes a violation of federal law, namely, bank fraud (Title 18, United States Code, Section 1344), and constitutes a felony under state law, namely, felony theft (720 ILCS 5/16-1(a) and (b)(4)), all in violation of Title 18, United States Code, Section 1028(a)(7); and

(b) knowingly and without lawful authority produce, and cause to be produced, in and affecting interstate commerce, a false identification document, namely, counterfeit identification documents, in violation of Title 18, United States Code, Section 1028(a)(1).

3. It was part of the conspiracy that between August 2000 and July 2003, defendants COOPER and MARTIN obtained personal identifying information, including names, birth dates, social security numbers, addresses, and phone numbers, and bank account information from various

sources they had at doctors' offices and hospitals in the Chicago area, including defendants HILL and WILLIAMS.

4. It was further part of the conspiracy that defendant HILL used her position at UCPG to access patient records and obtain personal and bank account information of UCPG patients, including names, dates of birth, social security numbers, addresses, and phone numbers.

5. It was further part of the conspiracy that defendant HILL sold the patients' personal and bank account information to defendant COOPER, without the patients' permission and without lawful authority. Part of the information defendant HILL sold to defendant COOPER included a copy of the patients' checks, which contained the patients' signatures. During the course of the conspiracy, defendant HILL sold defendant COOPER the personal and bank account information of over 100 UCPG patients. This information included bank account information from numerous federally insured financial institutions.

6. It was further part of the conspiracy that defendant WILLIAMS used her position at Lincoln Park Family Physicians to access patient records and obtain personal and bank account information of Lincoln Park Family Physicians patients, including names, dates of birth, social security numbers, addresses, and phones numbers.

7. It was further part of the conspiracy that defendant WILLIAMS sold the patients' personal and bank account information to defendant MARTIN, without the patients' permission and without lawful authority. Part of the information defendant WILLIAMS sold to defendant COOPER included a copy of the patients' checks, which contained the patients' signatures. During the course of the conspiracy, defendant WILLIAMS sold defendant MARTIN the personal and bank account

information of dozens of Lincoln Park Family Physicians patients. This information included bank account information from numerous federally insured financial institutions.

8. It was further part of the conspiracy that, after defendant COOPER and MARTIN obtained the patients' personal and bank account information from defendants HILL and WILLIAMS and others, defendant COOPER would call the banks to see if there was money in the patients' bank accounts.

9. It was further part of the conspiracy that, if there was sufficient money in the particular bank account, defendant COOPER and/or defendant MARTIN would call the co-conspirator who was going to go into the bank and pose as the legitimate account holder. Defendants RUCKER, ABRAMS, FOX, SMITH, LEWIS, and COOKS, and others, posed as the legitimate account holders during the conspiracy. In numerous cases, defendant COOPER also posed as the legitimate account holder. The co-conspirators referred to the person posing as the legitimate account holder as the "writer."

10. It was further part of the conspiracy that, after being contacted by defendant COOPER and/or defendant MARTIN, the writer would then go to either defendant COOPER's or defendant MARTIN's house, where defendant COOPER and/or defendant MARTIN would give the writer a copy of the account holder's information so the writer could memorize it. Defendant COOPER and/or defendant MARTIN also gave the writer a copy of the legitimate account holder's signature, so that the writer could practice it.

11. It was further part of the conspiracy that defendant COOPER and/or defendant MARTIN would take a picture of the writer to be used to create a fake identification document. Defendant MARTIN would then obtain a fake identification document from various individuals who

produced fake identification documents for her, including defendant VAUGHN, in the legitimate account holder's name and bearing the picture of the writer. In exchange for the counterfeit identification documents from Vaughn, defendant MARTIN gave defendant VAUGHN personal identifying information and bank account information of other individuals.

12. It was further part of the conspiracy that defendant MARTIN would obtain blank stolen checks from her sources. The blank checks contained legitimate corporate information and were mostly from closed accounts.

13. It was further part of the conspiracy that, after obtaining the stolen checks, defendant MARTIN would provide a stolen check to defendant COOPER, who would then fill out the stolen check as if the check was a payment to the legitimate account holder.

14. It was further part of the conspiracy that, after obtaining the fake ID and filling in the stolen check, defendant COOPER, defendant MARTIN, and/or others would travel with the writer to a branch of the legitimate account holder's bank. At the bank, the writer would enter the bank and deposit the stolen check into the legitimate account holder's account. At the same time as the deposits, the writer would withdraw monies from the legitimate account holder's account in an amount less than the deposited check.

15. It was further part of the conspiracy that defendant COOPER, defendant MARTIN, and the writer would then split the money they obtained from the legitimate account holder's account in equal amounts.

16. It was further part of the conspiracy that the co-conspirators used coded language and otherwise misrepresented, concealed, and hid, and caused to be misrepresented, concealed, and hidden, the purposes of and the acts done in furtherance of the conspiracy and used means to avoid

detection by law enforcement authorities and otherwise to provide security to the members of the conspiracy;

All in violation of Title 18, United States Code, Sections 1028(f) and 2.

COUNT TWO

The SPECIAL MARCH 2004 GRAND JURY further charges:

1. The Grand Jury realleges and incorporates by reference the allegations of paragraph 1 of Count One of this indictment.

2. On or about September 2, 2003, at Chicago, in the Northern District of Illinois, Eastern Division,

TIANA HILL,

defendant herein, did knowingly transfer in and affecting interstate commerce, without lawful authority, a means of identification of another person, namely, the name and social security number of Victim A, with the intent to commit and to aid and abet unlawful activity that constitutes a violation of federal law, namely, bank fraud (Title 18, United States Code, Section 1344), and constitutes a felony under state law, namely, felony theft (720 ILCS 5/16-1(a) and (b)(4));

All in violation of Title 18, United States Code, Section 1028(a)(7).

COUNT THREE

The SPECIAL MARCH 2004 GRAND JURY further charges:

1. The Grand Jury realleges and incorporates by reference the allegations of paragraph 1 of Count One of this indictment.

2. On or about September 4, 2003, at Chicago, in the Northern District of Illinois, Eastern Division,

TIANA HILL,

defendant herein, did knowingly transfer in and affecting interstate commerce, without lawful authority, means of identification of other persons, namely, the name, date of birth, and social security number of Victim B, Victim C, and Victim D, with the intent to commit and to aid and abet unlawful activity that constitutes a violation of federal law, namely, bank fraud (Title 18, United States Code, Section 1344), and constitutes a felony under state law, namely, felony theft (720 ILCS 5/16-1(a) and (b)(4));

All in violation of Title 18, United States Code, Section 1028(a)(7).

COUNT FOUR

The SPECIAL MARCH 2004 GRAND JURY further charges:

1. The Grand Jury realleges and incorporates by reference the allegations of paragraph 1 of Count One of this indictment.

2. On or about October 1, 2003, at Chicago, in the Northern District of Illinois, Eastern Division,

BONNIE WILLIAMS,

defendant herein, did knowingly transfer in and affecting interstate commerce, without lawful authority, means of identification of other persons, namely, the name, date of birth, and social security number of Victim E and Victim F, with the intent to commit and to aid and abet unlawful activity that constitutes a violation of federal law, namely, bank fraud (Title 18, United States Code, Section 1344), and constitutes a felony under state law, namely, felony theft (720 ILCS 5/16-1(a) and (b)(4));

All in violation of Title 18, United States Code, Section 1028(a)(7).

COUNT FIVE

The SPECIAL MARCH 2004 GRAND JURY further charges:

1. The Grand Jury realleges and incorporates by reference the allegations of paragraph 1 of Count One of this indictment.

2. In or about September 2001, at Chicago, in the Northern District of Illinois, Eastern Division,

ANTHONY VAUGHN,

defendant herein, knowingly and without lawful authority produced, and caused to be produced, in and affecting interstate commerce, a false identification document, namely, a counterfeit Illinois State driver's license in the name of Victim G;

In violation of Title 18, United States Code, Section 1028(a)(1).

COUNT SIX

The SPECIAL MARCH 2004 GRAND JURY further charges:

1. The Grand Jury realleges and incorporates by reference the allegations of paragraph 1 of Count One of this indictment.

2. In or about September 2001, at Chicago, in the Northern District of Illinois, Eastern Division,

ANTHONY VAUGHN,

defendant herein, did knowingly transfer in and affecting interstate commerce, without lawful authority, a means of identification of another person, namely, a counterfeit Illinois State driver's license containing the name, date of birth, and social security number of Victim G, with the intent to commit and to aid and abet unlawful activity that constitutes a violation of federal law, namely, bank fraud (Title 18, United States Code, Section 1344), and constitutes a felony under state law, namely, felony theft (720 ILCS 5/16-1(a) and (b)(4));

All in violation of Title 18, United States Code, Section 1028(a)(7).

COUNT SEVEN

The SPECIAL MARCH 2004 GRAND JURY further charges:

1. The Grand Jury realleges and incorporates by reference the allegations of paragraph 1 of Count One of this indictment.

2. In or about December 2001, at Chicago, in the Northern District of Illinois, Eastern Division,

ANTHONY VAUGHN,

defendant herein, knowingly and without lawful authority produced, and caused to be produced, in and affecting interstate commerce, a false identification document, namely, a counterfeit Illinois State driver's license in the name of Victim H;

In violation of Title 18, United States Code, Section 1028(a)(1).

COUNT EIGHT

The SPECIAL MARCH 2004 GRAND JURY further charges:

1. The Grand Jury realleges and incorporates by reference the allegations of paragraph 1 of Count One of this indictment.

2. In or about December 2001, at Chicago, in the Northern District of Illinois, Eastern Division,

ANTHONY VAUGHN,

defendant herein, did knowingly transfer in and affecting interstate commerce, without lawful authority, a means of identification of another person, namely, a counterfeit Illinois State driver's license containing the name, date of birth, and social security number of Victim H, with the intent to commit and to aid and abet unlawful activity that constitutes a violation of federal law, namely, bank fraud (Title 18, United States Code, Section 1344), and constitutes a felony under state law, namely, felony theft (720 ILCS 5/16-1(a) and (b)(4));

All in violation of Title 18, United States Code, Section 1028(a)(7).

COUNT NINE

The SPECIAL MARCH 2004 GRAND JURY further charges:

1. The Grand Jury realleges and incorporates by reference the allegations of paragraph 1 of Count One of this indictment.
2. In or about April 2003, at Chicago, in the Northern District of Illinois, Eastern Division,

ANTHONY VAUGHN,

defendant herein, knowingly and without lawful authority produced, and caused to be produced, in and affecting interstate commerce, a false identification document, namely, a counterfeit Illinois State driver's license in the name of Victim I;

In violation of Title 18, United States Code, Section 1028(a)(1).

COUNT TEN

The SPECIAL MARCH 2004 GRAND JURY further charges:

1. The Grand Jury realleges and incorporates by reference the allegations of paragraph 1 of Count One of this indictment.
2. In or about April 2003, at Chicago, in the Northern District of Illinois, Eastern Division,

ANTHONY VAUGHN,

defendant herein, did knowingly transfer in and affecting interstate commerce, without lawful authority, a means of identification of another person, namely, a counterfeit Illinois State driver's license containing the name, date of birth, and social security number of Victim I, with the intent to commit and to aid and abet unlawful activity that constitutes a violation of federal law, namely, bank fraud (Title 18, United States Code, Section 1344), and constitutes a felony under state law, namely, felony theft (720 ILCS 5/16-1(a) and (b)(4));

All in violation of Title 18, United States Code, Section 1028(a)(7).

COUNT ELEVEN

The SPECIAL MARCH 2004 GRAND JURY further charges:

On or about June 29, 2004, at Chicago, in the Northern District of Illinois, Eastern Division,

ANTHONY VAUGHN,

defendant herein, knowingly possessed document-making implements and authentication features with the intent that such document-making implements and authentication features will be used in the production of a false identification document;

In violation of Title 18, United States Code, Section 1028(a)(5).

COUNT TWELVE

The SPECIAL MARCH 2004 GRAND JURY further charges:

1. The Grand Jury realleges and incorporates by reference the allegations of paragraph 1 of Count One of this indictment.

2. In or about February 8, 2003, at Gurnee, in the Northern District of Illinois, Eastern Division,

CHONTELLA COOKS,

defendant herein, did knowingly use in and affecting interstate commerce, without lawful authority, a means of identification of another person, namely, the name, date of birth, and social security number of Victim J, with the intent to commit and to aid and abet unlawful activity that constitutes a violation of federal law, namely, bank fraud (Title 18, United States Code, Section 1344), and constitutes a felony under state law, namely, felony theft (720 ILCS 5/16-1(a) and (b)(4));

All in violation of Title 18, United States Code, Section 1028(a)(7).

COUNT THIRTEEN

The SPECIAL MARCH 2004 GRAND JURY further charges:

1. The Grand Jury realleges and incorporates by reference the allegations of paragraph 1 of Count One of this indictment.
2. On or about May 1, 2003, at Elgin, in the Northern District of Illinois, Eastern Division,

PAMELA FOX,

defendant herein, did knowingly use in and affecting interstate commerce, without lawful authority, a means of identification of another person, namely, the name, date of birth, and social security number of Victim I, with the intent to commit and to aid and abet unlawful activity that constitutes a violation of federal law, namely, bank fraud (Title 18, United States Code, Section 1344), and constitutes a felony under state law, namely, felony theft (720 ILCS 5/16-1(a) and (b)(4));

All in violation of Title 18, United States Code, Section 1028(a)(7).

COUNT FOURTEEN

The SPECIAL MARCH 2004 GRAND JURY further charges:

1. The Grand Jury realleges and incorporates by reference the allegations of paragraph 1 of Count One of this indictment.
2. On or about June 10, 2003, at Gurnee, in the Northern District of Illinois, Eastern Division,

JOHN LEWIS,

defendant herein, did knowingly use in and affecting interstate commerce, without lawful authority, a means of identification of another person, namely, the name, date of birth, and social security number of Victim K, with the intent to commit and to aid and abet unlawful activity that constitutes a violation of federal law, namely, bank fraud (Title 18, United States Code, Section 1344), and constitutes a felony under state law, namely, felony theft (720 ILCS 5/16-1(a) and (b)(4));

All in violation of Title 18, United States Code, Section 1028(a)(7).

COUNT FIFTEEN

The SPECIAL MARCH 2004 GRAND JURY further charges:

1. The Grand Jury realleges and incorporates by reference the allegations of paragraph 1 of Count One of this indictment.

2. On or about June 10, 2003, at Oak Park, in the Northern District of Illinois, Eastern Division,

JOHN LEWIS,

defendant herein, did knowingly possess in and affecting interstate commerce, without lawful authority, a means of identification of another person, namely, the name, date of birth, and social security number of Victim K, with the intent to commit and to aid and abet unlawful activity that constitutes a violation of federal law, namely, bank fraud (Title 18, United States Code, Section 1344), and constitutes a felony under state law, namely, felony theft (720 ILCS 5/16-1(a) and (b)(4));

All in violation of Title 18, United States Code, Section 1028(a)(7).

COUNT SIXTEEN

The SPECIAL MARCH 2004 GRAND JURY further charges:

1. The Grand Jury realleges and incorporates by reference the allegations of paragraph 1 of Count One of this indictment.
2. On or about February 2, 2001, at Berwyn, in the Northern District of Illinois, Eastern Division,

KIMBERLY RUCKER,

defendant herein, did knowingly use in and affecting interstate commerce, without lawful authority, a means of identification of another person, namely, the name, date of birth, and social security number of Victim L, with the intent to commit and to aid and abet unlawful activity that constitutes a violation of federal law, namely, bank fraud (Title 18, United States Code, Section 1344), and constitutes a felony under state law, namely, felony theft (720 ILCS 5/16-1(a) and (b)(4));

All in violation of Title 18, United States Code, Section 1028(a)(7).

COUNT SEVENTEEN

The SPECIAL MARCH 2004 GRAND JURY further charges:

1. The Grand Jury realleges and incorporates by reference the allegations of paragraph 1 of Count One of this indictment.
2. On or about February 6, 2001, at Chicago, in the Northern District of Illinois, Eastern Division,

KIMBERLY RUCKER,

defendant herein, did knowingly use in and affecting interstate commerce, without lawful authority, a means of identification of another person, namely, the name, date of birth, and social security number of Victim L, with the intent to commit and to aid and abet unlawful activity that constitutes a violation of federal law, namely, bank fraud (Title 18, United States Code, Section 1344), and constitutes a felony under state law, namely, felony theft (720 ILCS 5/16-1(a) and (b)(4));

All in violation of Title 18, United States Code, Section 1028(a)(7).

COUNT EIGHTEEN

The SPECIAL MARCH 2004 GRAND JURY further charges:

1. The Grand Jury realleges and incorporates by reference the allegations of paragraph 1 of Count One of this indictment.
2. On or about February 17, 2001, at Cicero, in the Northern District of Illinois, Eastern Division,

KIMBERLY RUCKER,

defendant herein, did knowingly use in and affecting interstate commerce, without lawful authority, a means of identification of another person, namely, the name, date of birth, and social security number of Victim M, with the intent to commit and to aid and abet unlawful activity that constitutes a violation of federal law, namely, bank fraud (Title 18, United States Code, Section 1344), and constitutes a felony under state law, namely, felony theft (720 ILCS 5/16-1(a) and (b)(4));

All in violation of Title 18, United States Code, Section 1028(a)(7).

COUNT NINETEEN

The SPECIAL MARCH 2004 GRAND JURY further charges:

1. The Grand Jury realleges and incorporates by reference the allegations of paragraph 1 of Count One of this indictment.
2. On or about September 13, 2001, at Niles, in the Northern District of Illinois, Eastern Division,

RICQUIA ABRAMS,

defendant herein, did knowingly possess in and affecting interstate commerce, without lawful authority, a means of identification of another person, namely, the name, date of birth, and social security number of Victim G, with the intent to commit and to aid and abet unlawful activity that constitutes a violation of federal law, namely, bank fraud (Title 18, United States Code, Section 1344), and constitutes a felony under state law, namely, felony theft (720 ILCS 5/16-1(a) and (b)(4));

All in violation of Title 18, United States Code, Section 1028(a)(7).

COUNT TWENTY

The SPECIAL MARCH 2004 GRAND JURY further charges:

1. The Grand Jury realleges and incorporates by reference the allegations of paragraph 1 of Count One of this indictment.
2. On or about December 4, 2001, at Chicago, in the Northern District of Illinois, Eastern Division,

RICQUIA ABRAMS,

defendant herein, did knowingly use in and affecting interstate commerce, without lawful authority, a means of identification of another person, namely, the name, date of birth, and social security number of Victim N, with the intent to commit and to aid and abet unlawful activity that constitutes a violation of federal law, namely, bank fraud (Title 18, United States Code, Section 1344), and constitutes a felony under state law, namely, felony theft (720 ILCS 5/16-1(a) and (b)(4));

All in violation of Title 18, United States Code, Section 1028(a)(7).

COUNT TWENTY-ONE

The SPECIAL MARCH 2004 GRAND JURY further charges:

1. The Grand Jury realleges and incorporates by reference the allegations of paragraph 1 of Count One of this indictment.

2. On or about December 31, 2001, at Chicago, in the Northern District of Illinois, Eastern Division,

RICQUIA ABRAMS,

defendant herein, did knowingly possess in and affecting interstate commerce, without lawful authority, a means of identification of another person, namely, the name, date of birth, and social security number of Victim O, with the intent to commit and to aid and abet unlawful activity that constitutes a violation of federal law, namely, bank fraud (Title 18, United States Code, Section 1344), and constitutes a felony under state law, namely, felony theft (720 ILCS 5/16-1(a) and (b)(4));

All in violation of Title 18, United States Code, Section 1028(a)(7).

COUNT TWENTY-TWO

The SPECIAL MARCH 2004 GRAND JURY further charges:

1. The Grand Jury realleges and incorporates by reference the allegations of paragraph 1 of Count One of this indictment.
2. From in and about August 2000 and continuing to in or about October 2003, in the Northern District of Illinois, Eastern Division, and elsewhere,

GERALDINE COOPER,
LAMONT MARTIN,
TIANA HILL,
BONNIE WILLIAMS,
ANOTHONY VAUGHN,
KIMBERLY RUCKER,
RICQUIA ABRAMS,
PAMELA FOX,
JOHN LEWIS, and
CHONTELLA COOKS,

defendants herein, did knowingly devise, intend to devise, and participate in a scheme to defraud University National Bank, Old Kent Bank, Fifth Third Bank, Citizens Financial Bank, Bank One, Harris Bank, LaSalle Bank, Charter One Bank, Hyde Park Bank, and other federally insured financial institutions (collectively the “victim banks”), and to obtain money and funds owned by and under the custody and control of the victim banks, by means of materially false and fraudulent pretenses, representations, and promises, and material omissions, as more fully described below.

3. It was part of the scheme that between August 2000 and July 2003, defendants COOPER and MARTIN obtained personal identifying information, including names, birth dates, social security numbers, addresses, and phone numbers, and bank account information from

various sources they had at doctors' offices and hospitals in the Chicago area, including defendants HILL and WILLIAMS.

4. It was further part of the scheme that defendant HILL used her position at UCPG to access patient records and obtain personal and bank account information of UCPG patients, including names, dates of birth, social security numbers, addresses, and phone numbers.

5. It was further part of the scheme that defendant HILL sold the patients' personal and bank account information to defendant COOPER, without the patients' permission and without lawful authority. Part of the information defendant HILL sold to defendant COOPER included a copy of the patients' checks, which contained the patients' signatures. During the course of the scheme, defendant HILL sold defendant COOPER the personal and bank account information of over 100 UCPG patients. This information included bank account information from numerous federally insured financial institutions.

6. It was further part of the scheme that defendant WILLIAMS used her position at Lincoln Park Family Physicians to access patient records and obtain personal and bank account information of Lincoln Park Family Physicians patients, including names, dates of birth, social security numbers, addresses, and phones numbers.

7. It was further part of the scheme that defendant WILLIAMS sold the patients' personal and bank account information to defendant MARTIN, without the patients' permission and without lawful authority. Part of the information defendant WILLIAMS sold to defendant COOPER included a copy of the patients' checks, which contained the patients' signatures. During the course of the scheme, defendant WILLIAMS sold defendant MARTIN the personal and bank account information of dozens of Lincoln Park Family Physicians patients. This

information included bank account information from numerous federally insured financial institutions.

8. It was further part of the scheme that, after defendant COOPER and MARTIN obtained the patients' personal and bank account information from defendants HILL and WILLIAMS and others, defendant COOPER would call the banks to see if there was money in the patients' bank accounts.

9. It was further part of the scheme that, if there was sufficient money in the particular bank account, defendant COOPER and/or defendant MARTIN would call the co-schemer who was going to go into the bank and pose as the legitimate account holder. Defendants RUCKER, ABRAMS, FOX, SMITH, LEWIS, and COOKS, and others, posed as the legitimate account holders during the scheme. In numerous cases, defendant COOPER also posed as the legitimate account holder. The co-schemers referred to the person posing as the legitimate account holder as the "writer."

10. It was further part of the scheme that, after being contacted by defendant COOPER and/or defendant MARTIN, the writer would then go to either defendant COOPER's or defendant MARTIN's house, where defendant COOPER and/or defendant MARTIN would give the writer a copy of the account holder's information so the writer could memorize it. Defendant COOPER and/or defendant MARTIN also gave the writer a copy of the legitimate account holder's signature, so that the writer could practice it.

11. It was further part of the scheme that defendant COOPER and/or defendant MARTIN would take a picture of the writer to be used to create a fake identification document. Defendant MARTIN would then obtain a fake identification document from various individuals

who produced fake identification documents for her, including defendant VAUGHN, in the legitimate account holder's name and bearing the picture of the writer. In exchange for the counterfeit identification documents from Vaughn, defendant MARTIN gave defendant VAUGHN personal identifying information and bank account information of other individuals.

12. It was further part of the scheme that defendant MARTIN would obtain blank stolen checks from her sources. The blank checks contained legitimate corporate information and were mostly from closed accounts.

13. It was further part of the scheme that, after obtaining the stolen checks, defendant MARTIN would provide a stolen check to defendant COOPER, who would then fill out the stolen check as if the check was a payment to the legitimate account holder.

14. It was further part of the scheme that, after obtaining the fake ID and filling in the stolen check, defendant COOPER, defendant MARTIN, and/or others would travel with the writer to a branch of the legitimate account holder's bank. At the bank, the writer would enter the bank and deposit the stolen check into the legitimate account holder's account. At the same time as the deposits, the writer would withdraw monies from the legitimate account holder's account in an amount less than the deposited check.

15. It was further part of the scheme that defendant COOPER, defendant MARTIN, and the writer would then split the money they obtained from the legitimate account holder's account in equal amounts.

16. It was further part of the scheme that the co-schemers used coded language and otherwise misrepresented, concealed, and hid, and caused to be misrepresented, concealed, and hidden, the purposes of and the acts done in furtherance of the scheme and used means to avoid

detection by law enforcement authorities and otherwise to provide security to the members of the scheme;

17. On or about December 20, 2001, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

GERALDINE COOPER and
LAMONT MARTIN,

defendants herein, knowingly executed and attempted to execute the aforementioned scheme by submitting and causing to be submitted to University National Bank, 1354 East 55th Street, Chicago, Illinois, a check made payable to Victim H in the amount of \$7,500, a withdrawal request in the amount of \$3,000 from Victim H's account, and a counterfeit Illinois Driver's license bearing defendant COOPER's image and the personal identifying information of Victim H, all of which defendants COOPER and MARTIN knew to be false, counterfeit, and fraudulent; and

TIANA HILL and
ANTHONY VAUGHN,

defendants herein, did knowingly aid, abet, induce, and procure the commission of said offense;

In violation of Title 18, United States Code, Sections 1344 and 2.

COUNT TWENTY-THREE

The SPECIAL MARCH 2004 GRAND JURY further charges:

1. Paragraphs 1 through 16 of Count Twenty-Two of this indictment are realleged as if fully restated here.

2. On or about December 21, 2001, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

GERALDINE COOPER and
LAMONT MARTIN,

defendants herein, knowingly executed and attempted to execute the aforementioned scheme by submitting and causing to be submitted to University National Bank, 1354 East 55th Street, Chicago, Illinois, a check made payable to Victim H in the amount of \$7,500, a withdrawal request in the amount of \$3,000 from Victim H's account, and a counterfeit Illinois Driver's license bearing defendant COOPER's image and the personal identifying information of Victim H, all of which defendants COOPER and MARTIN knew to be false, counterfeit, and fraudulent; and

TIANA HILL and
ANTHONY VAUGHN,

defendants herein, did knowingly aid, abet, induce, and procure the commission of said offense;

In violation of Title 18, United States Code, Sections 1344 and 2.

COUNT TWENTY-FOUR

The SPECIAL MARCH 2004 GRAND JURY further charges:

1. Paragraphs 1 through 16 of Count Twenty-Two of this indictment are realleged as if fully restated here.

2. On or about May 31, 2001, at Aurora, in the Northern District of Illinois, Eastern Division, and elsewhere,

GERALDINE COOPER and
LAMONT MARTIN,

defendants herein, knowingly executed and attempted to execute the aforementioned scheme by submitting and causing to be submitted to Old Kent Bank, 1851 Galena, Aurora, Illinois, a check made payable to Victim P in the amount of \$6,500, a withdrawal request in the amount of \$2,500 from Victim P's account, and a counterfeit Illinois Driver's license bearing defendant COOPER's image and the personal identifying information of Victim P, all of which defendants COOPER and MARTIN knew to be false, counterfeit, and fraudulent; and

BONNIE WILLIAMS,

defendant herein, did knowingly aid, abet, induce, and procure the commission of said offense;

In violation of Title 18, United States Code, Sections 1344 and 2.

COUNT TWENTY-FIVE

The SPECIAL MARCH 2004 GRAND JURY further charges:

1. Paragraphs 1 through 16 of Count Twenty-Two of this indictment are realleged as if fully restated here.

2. On or about June 25, 2001, at Aurora, in the Northern District of Illinois, Eastern Division, and elsewhere,

GERALDINE COOPER and
LAMONT MARTIN,

defendants herein, knowingly executed and attempted to execute the aforementioned scheme by submitting and causing to be submitted to Fifth Third Bank, 1645 Larkin, Elgin, Illinois, a check made payable to Victim Q in the amount of \$6,500, a withdrawal request in the amount of \$2,500 from Victim Q's account, and a counterfeit Illinois Driver's license bearing defendant COOPER's image and the personal identifying information of Victim Q, all of which defendants COOPER and MARTIN knew to be false, counterfeit, and fraudulent; and

BONNIE WILLIAMS,

defendant herein, did knowingly aid, abet, induce, and procure the commission of said offense;

In violation of Title 18, United States Code, Sections 1344 and 2.

COUNT TWENTY-SIX

The SPECIAL MARCH 2004 GRAND JURY further charges:

1. Paragraphs 1 through 16 of Count Twenty-Two of this indictment are realleged as if fully restated here.

2. On or about February 8, 2003, at Gurnee, in the Northern District of Illinois, Eastern Division, and elsewhere,

CHONTELLA COOKS,

defendant herein, knowingly executed and attempted to execute the aforementioned scheme by submitting and causing to be submitted to Fifth Third Bank, 4840 Grand Avenue, Gurnee, Illinois, a check made payable to Victim J in the amount of \$8,300, a withdrawal request in the amount of \$8,000 from Victim J's account, and a counterfeit Illinois Driver's license bearing defendant COOK's image and the personal identifying information of Victim J, all of which defendant COOK knew to be false, counterfeit, and fraudulent;

In violation of Title 18, United States Code, Section 1344.

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COUNT TWENTY-SEVEN

The SPECIAL MARCH 2004 GRAND JURY further charges:

1. Paragraphs 1 through 16 of Count Twenty-Two of this indictment are realleged as if fully restated here.

2. On or about May 1, 2003, at Gurnee, in the Northern District of Illinois, Eastern Division, and elsewhere,

PAMELA FOX,

defendant herein, knowingly attempted to execute the aforementioned scheme by submitting and causing to be submitted to Harris Bank, 6547 Grand Avenue, Gurnee, Illinois, a check made payable to Victim I in the amount of \$6,500, a withdrawal request in the amount of \$4,000 from Victim I's account, and a counterfeit Illinois Driver's license bearing defendant FOX's image and the personal identifying information of Victim I, all of which defendant FOX knew to be false, counterfeit, and fraudulent;

In violation of Title 18, United States Code, Section 1344; and

ANTHONY VAUGHN,

defendant herein, did willfully aid, abet, induce, and procure the commission of said offense;

In violation of Title 18, United States Code, Section 2.

COUNT TWENTY-EIGHT

The SPECIAL MARCH 2004 GRAND JURY further charges:

1. Paragraphs 1 through 16 of Count Twenty-Two of this indictment are realleged as if fully restated here.

2. On or about June 10, 2003, at Gurnee, in the Northern District of Illinois, Eastern Division, and elsewhere,

JOHN LEWIS,

defendant herein, knowingly executed and attempted to execute the aforementioned scheme by submitting and causing to be submitted to Fifth Third Bank, 4840 Grand Avenue, Gurnee, Illinois, a check made payable to Victim K in the amount of \$7,300, a withdrawal request in the amount of \$1,000 from Victim K's account, and a counterfeit Illinois Driver's license bearing defendant LEWIS's image and the personal identifying information of Victim K, all of which defendant LEWIS knew to be false, counterfeit, and fraudulent;

In violation of Title 18, United States Code, Section 1344.

COUNT TWENTY-NINE

The SPECIAL MARCH 2004 GRAND JURY further charges:

1. Paragraphs 1 through 16 of Count Twenty-Two of this indictment are realleged as if fully restated here.

2. On or about June 10, 2003, at Oak Park, in the Northern District of Illinois, Eastern Division, and elsewhere,

JOHN LEWIS,

defendant herein, knowingly attempted to execute the aforementioned scheme by submitting and causing to be submitted to Fifth Third Bank, 804 South Oak Park Avenue, Oak Park, Illinois, a check made payable to Victim K in the amount of \$2,000, a withdrawal request in the amount of \$1,000 from Victim K's account, and a counterfeit Illinois Driver's license bearing defendant LEWIS's image and the personal identifying information of Victim K, all of which defendant LEWIS knew to be false, counterfeit, and fraudulent;

In violation of Title 18, United States Code, Section 1344.

COUNT THIRTY

The SPECIAL MARCH 2004 GRAND JURY further charges:

1. Paragraphs 1 through 16 of Count Twenty-Two of this indictment are realleged as if fully restated here.

2. On or about February 2, 2001, at Berwyn, in the Northern District of Illinois, Eastern Division, and elsewhere,

KIMBERLY RUCKER,

defendant herein, knowingly executed and attempted to execute the aforementioned scheme by submitting and causing to be submitted to LaSalle Bank, 6400 West Cermack, Berwyn, Illinois, a check made payable to Victim L in the amount of \$6,500, a withdrawal request in the amount of \$3,000 from Victim L's account, and a counterfeit Illinois Driver's license bearing defendant RUCKER's image and the personal identifying information of Victim L, all of which defendant RUCKER knew to be false, counterfeit, and fraudulent;

In violation of Title 18, United States Code, Section 1344.

COUNT THIRTY-ONE

The SPECIAL MARCH 2004 GRAND JURY further charges:

1. Paragraphs 1 through 16 of Count Twenty-Two of this indictment are realleged as if fully restated here.

2. On or about February 2, 2001, at Berwyn, in the Northern District of Illinois, Eastern Division, and elsewhere,

KIMBERLY RUCKER,

defendant herein, knowingly executed and attempted to execute the aforementioned scheme by submitting and causing to be submitted to LaSalle Bank, 6400 West Cermack, Berwyn, Illinois, a check made payable to Victim L in the amount of \$6,500, a withdrawal request in the amount of \$2,500 from Victim L's account, and a counterfeit Illinois Driver's license bearing defendant RUCKER's image and the personal identifying information of Victim L, all of which defendant RUCKER knew to be false, counterfeit, and fraudulent;

In violation of Title 18, United States Code, Section 1344.

COUNT THIRTY-TWO

The SPECIAL MARCH 2004 GRAND JURY further charges:

1. Paragraphs 1 through 16 of Count Twenty-Two of this indictment are realleged as if fully restated here.

2. On or about February 17, 2001, at Cicero, in the Northern District of Illinois, Eastern Division, and elsewhere,

KIMBERLY RUCKER,

defendant herein, knowingly attempted to execute the aforementioned scheme by submitting and causing to be submitted to LaSalle Bank, 5801 West Cermack, Cicero, Illinois, a check made payable to Victim M in the amount of \$7,894.23, a withdrawal request in the amount of \$5,000 from Victim M's account, and a counterfeit Illinois Driver's license bearing defendant RUCKER's image and the personal identifying information of Victim M, all of which defendant RUCKER knew to be false, counterfeit, and fraudulent;

In violation of Title 18, United States Code, Section 1344.

COUNT THIRTY-THREE

The SPECIAL MARCH 2004 GRAND JURY further charges:

1. Paragraphs 1 through 16 of Count Twenty-Two of this indictment are realleged as if fully restated here.

2. On or about September 13, 2001, at Niles, in the Northern District of Illinois, Eastern Division, and elsewhere,

RICQUIA ABRAMS,

defendant herein, knowingly executed and attempted to execute the aforementioned scheme by submitting and causing to be submitted to Fifth Third Bank, 5697 South Touhy, Niles, Illinois, a check made payable to Victim G in the amount of \$7,500, a withdrawal request in the amount of \$3,000 from Victim G's account, and a counterfeit Illinois Driver's license bearing defendant ABRAMS's image and the personal identifying information of Victim G, all of which defendant ABRAMS knew to be false, counterfeit, and fraudulent; and

ANTHONY VAUGHN,

defendant herein, did knowingly aid, abet, induce, and procure the commission of said offense;

In violation of Title 18, United States Code, Sections 1344 and 2.

COUNT THIRTY-FOUR

The SPECIAL MARCH 2004 GRAND JURY further charges:

1. Paragraphs 1 through 16 of Count Twenty-Two of this indictment are realleged as if fully restated here.

2. On or about December 4, 2001, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

RICQUIA ABRAMS,

defendant herein, knowingly executed and attempted to execute the aforementioned scheme by submitting and causing to be submitted to Charter One Bank, 11150 South Western, Chicago, Illinois, a check made payable to Victim N in the amount of \$6,500, a withdrawal request in the amount of \$3,000 from Victim N's account, and a counterfeit Illinois Driver's license bearing defendant ABRAMS's image and the personal identifying information of Victim N, all of which defendant ABRAMS knew to be false, counterfeit, and fraudulent;

In violation of Title 18, United States Code, Section 1344.

COUNT THIRTY-FIVE

The SPECIAL MARCH 2004 GRAND JURY further charges:

1. Paragraphs 1 through 16 of Count Twenty-Two of this indictment are realleged as if fully restated here.

2. On or about December 31, 2001, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

RICQUIA ABRAMS,

defendant herein, knowingly executed and attempted to execute the aforementioned scheme by submitting and causing to be submitted to Hyde Park Bank, 1525 East 53rd Street, Chicago, Illinois, a check made payable to Victim O in the amount of \$6,500, a withdrawal request in the amount of \$3,000 from Victim O's account, and a counterfeit Illinois Driver's license bearing defendant ABRAMS's image and the personal identifying information of Victim O, all of which defendant ABRAMS knew to be false, counterfeit, and fraudulent;

In violation of Title 18, United States Code, Section 1344.

FORFEITURE ALLEGATION ONE

The SPECIAL MARCH 2004 GRAND JURY further charges:

1. The allegations contained in Counts One through Twenty-One of this indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 982.

2. As a result of the violations of Title 18, United States Code, Section 1028, as alleged in the foregoing Counts One through Twenty-Three,

GERALDINE COOPER,
LAMONT MARTIN,
TIANA HILL,
BONNIE WILLIAMS,
ANOTHONY VAUGHN,
KIMBERLY RUCKER,
RICQUIA ABRAMS,
JAMES SMITH,
PAMELA FOX,
JOHN LEWIS, and
CHONTELLA COOKS,

defendants herein, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982: (1) any and all right, title, and interest defendants may have in any property, real and personal, which constitutes and is derived from, proceeds obtained directly or indirectly from fraud and related activity in connection with means of identification and identification documents, which property is subject to forfeiture pursuant to Title 18, United States Code, Section 982; and (2) any and all right, title, and interest defendants may have in any property, real or personal, used or intended to be used to commit the offenses alleged in Counts One through Twenty-Three of this indictment, which property is subject to forfeiture pursuant to Title 18, United States Code, Section 1028(b)(5).

3. The interests of defendants subject to forfeiture to the United States pursuant to Title 18, United States Code, Section 982, include, but are not limited to:

- (a) all property that was used to further the fraud and related activity in connection with false identification documents, including, but not limited to, property seized on June 29, 2004, from storage units 7026 and 7023 at the U-Stor-It Self Storage facility located at 1000 East 95th Street, Chicago, Illinois.
- (b) all money and other property that constituted or derived from the proceeds of each transaction, and was obtained directly or indirectly, as a result of that violation, including, but not limited to approximately \$150,000.

4. If any of the forfeitable property described above, as a result of any act or omission by the defendants:

- (a) Cannot be located upon the exercise of due diligence;
- (b) Has been transferred or sold to, or deposited with, a third party;
- (c) Has been placed beyond the jurisdiction of the Court;
- (d) Has been substantially diminished in value; or
- (e) Has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property under the provisions of Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1).

All pursuant to Title 18, United States Code, Sections 982(a)(2)(B) and 1028(b)(5).

FORFEITURE ALLEGATION TWO

The SPECIAL MARCH 2004 GRAND JURY further charges:

1. The allegations contained in Counts Twenty-Two through Thirty-Five of this Indictment are realleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 982.

2. As a result of their violations of Title 18, United States Code, Section 1344, as alleged in the foregoing indictment,

GERALDINE COOPER,
LAMONT MARTIN,
TIANA HILL,
BONNIE WILLIAMS,
ANOTHONY VAUGHN,
KIMBERLY RUCKER,
RICQUIA ABRAMS,
PAMELA FOX,
JOHN LEWIS, and
CHONTELLA COOKS,

defendants herein, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(2), any and all right, title, and interest they may have in any property, real and personal, constituting, and derived from, proceeds obtained, directly and indirectly, from bank fraud in connection with the victims banks, which property is subject to forfeiture pursuant to Title 18, United States Code, Section 982.

3. The interests of the defendants jointly and severally subject to forfeiture pursuant to Title 18, United States Code, Section 982, include: all money and other property that was the subject of each transaction; constituted and was derived from the proceeds of each transaction

and was obtained, directly and indirectly, as a result of those violations, including but not limited to approximately \$150,000.

4. If any of the property subject to forfeiture and described above, as a result of any act or omission of the defendants:

- (a) Cannot be located upon the exercise of due diligence;
- (b) Has been transferred or sold to, or deposited with, a third party;
- (c) Has been placed beyond the jurisdiction of the Court;
- (d) Has been substantially diminished in value; or
- (e) Has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property under the provisions of Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1).

All pursuant to Title 18, United States Code, Section 982(a)(2)(A).

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY